

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2000-040-C

MARCH 24, 2000

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7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR
9 BUSINESS ADDRESS.

11 A. My name is Ronald M. Pate. I am employed by BellSouth
12 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection
13 Services. In this position, I handle certain issues related to local
14 interconnection matters, primarily operations support systems ("OSS").
15 My business address is 675 West Peachtree Street, Atlanta, Georgia
16 30375.

18 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

20 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in
21 1973, with a Bachelor of Science Degree. In 1984, I received a
22 Masters of Business Administration from Georgia State University. My
23 professional career spans over twenty-five years of general
24 management experience in operations, logistics management, human

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1 resources, sales and marketing. I joined BellSouth in 1987, and have
2 held various positions of increasing responsibility with BellSouth.

3

4 Q. HAVE YOU TESTIFIED PREVIOUSLY?

5

6 A. Yes. I have testified before the Public Service Commissions
7 ("Commission") in Alabama, Florida, Georgia, Louisiana, South
8 Carolina, the Tennessee Regulatory Authority and the North Carolina
9 Utilities Commission.

10

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12

13 A. The purpose of my testimony is to provide BellSouth's position on Issue
14 Nos. 8, 52, 53, 54, and 58 raised by e.spire Communications, Inc.
15 ("e.spire") in its Petition for Arbitration filed with the South Carolina
16 Public Service Commission on January 21, 2000.

17

18 ***Issue 8: Should BellSouth be required to lower rates for manual***
19 ***submission of orders, or, alternately, establish a revised "threshold***
20 ***billing plan" that (i) extends the timeframe for migration to electronic***
21 ***order submission and (ii) deletes services which are not available***
22 ***through electronic interfaces from the calculation of threshold billing***
23 ***amounts?***

24

1 Q. WHICH PARTS OF THE ABOVE ISSUE ARE YOU ADDRESSING?

2

3 A. My testimony addresses BellSouth's obligation to provide
4 nondiscriminatory access to BellSouth's OSS. Mr. Alphonso Varner
5 provides BellSouth's position on Issue #8 in his testimony.

6

7 Q. ON PAGE 19 OF MR. FALVEY'S TESTIMONY, HE STATES THAT
8 "[I]N MANY CASES THERE ARE NOT REAL ALTERNATIVES TO
9 MANUAL SUBMISSION OF ORDERS, BECAUSE BELL SOUTH'S
10 ELECTRONIC ORDERING SYSTEM IS EITHER FAULTY OR FAILS
11 TO INCLUDE ALL THE NECESSARY CATEGORIES OF SERVICES".
12 PLEASE COMMENT.

13

14 A. First, Mr. Falvey makes judgmental comments as to the performance of
15 BellSouth's electronic ordering systems without providing any
16 supporting data. Thus, his testimony on the point is not substantiated.

17

18 Secondly, BellSouth currently provides non-discriminatory access to its
19 OSS for Competitive Local Exchange Carriers ("CLECs") via electronic
20 and manual interfaces. Section 251(c)(3) of the Telecommunications
21 Act of 1996 ("Act"), requires that the incumbent Local Exchange
22 Company ("ILEC"), such as BellSouth, provide non-discriminatory
23 access to its OSS functions for pre-ordering, ordering, provisioning,
24 maintenance/repair and billing for network elements and resale
25 services. The Federal Communications Commission ("FCC") requires

1 that CLECs be provided access to these required functions and
2 information for resold services in "substantially the same time and
3 manner" as it provides to itself. For unbundled network elements, an
4 ILEC must provide access that provides efficient CLECs with a
5 meaningful opportunity to compete.

6
7 Q. DOES NON-DISCRIMINATORY ACCESS MEAN ALL SERVICES
8 MUST BE ORDERED ELECTRONICALLY?

9
10 A. No. Non-discriminatory access does not require that all information and
11 functions for CLECs must be electronic and involve no manual
12 handling. Many of BellSouth's retail services, primarily complex
13 services, involve substantial manual handling by BellSouth account
14 teams for BellSouth's own retail customers. Non-discriminatory access
15 to certain functions for CLECs also legitimately may involve manual
16 processes for these same functions. These processes are in
17 compliance with the Act and the FCC's rules.

18
19 The specialized and complicated nature of complex services, together
20 with their relatively low volume of orders as compared to basic
21 exchange services, renders them less suitable for mechanization,
22 whether for retail or resale applications. Complex, variable processes
23 are difficult to mechanize, and BellSouth has concluded that
24 mechanizing many lower-volume complex retail services would be
25 imprudent for its own retail operations, in that the benefits of

1 mechanization would not justify the cost. Since the same manual
2 processes are in place for both CLEC and BellSouth retail orders, the
3 processes are competitively neutral, which is exactly what both the Act
4 and the FCC require.

5
6 Q. MR FALVEY ALLEGES, ON PAGE 20, OF HIS TESTIMONY THAT
7 "[B]ELLSOUTH WAS INITIALLY SLOW TO DEVELOP [ELECTRONIC
8 ORDERING SYSTEMS], AND WHEN IT DID, IT KEPT SWITCHING
9 SYSTEMS". MR FALVEY FURTHER STATES ON PAGES 20-21 OF
10 HIS TESTIMONY THAT "FIRST, IT WAS LENS, BUT THAT WAS
11 ONLY GOOD FOR PRE-ORDERING AND NOT ORDERING; THEN
12 EDI-PC, BUT BELLSOUTH COULD NOT MAINTAIN THAT SYSTEM
13 AND DID NOT WORK WITH THE VENDOR TO MAKE IT Y2K
14 COMPATIBLE; NOW TAG IS AVAILABLE." PLEASE COMMENT.

15
16 Q. BellSouth developed and implemented, and continues to support, a
17 variety of electronic interfaces to its OSS to meet the individual needs
18 of the CLECs in the BellSouth region. BellSouth implemented the
19 industry standard machine-to-machine Electronic Data Interchange
20 ("EDI") ordering interface in December 1996. On April 28, 1997,
21 BellSouth implemented the human-to-machine Local Exchange
22 Navigation System ("LENS") pre-ordering and ordering interfaces to be
23 used by the CLECs that have made the business decision not to
24 integrate the pre-ordering and ordering interfaces with their own internal

1 OSS. BellSouth developed the machine-to-machine
2 Telecommunications Access Gateway ("TAG") pre-ordering and
3 ordering interfaces based on the Common Object Request Broker
4 Architecture ("CORBA") industry standard, which was the national
5 standards committee's preferred long term solution to best meet the
6 needs of the overall CLEC community. BellSouth introduced the TAG
7 pre-ordering interface on August 31, 1998 and the TAG ordering
8 interface on November 1, 1998. The TAG pre-ordering interface can
9 be integrated with either the TAG ordering interface or the EDI ordering
10 interface and the CLEC's own OSS. Each of these interfaces was
11 designed to better meet the needs of the CLEC community, not to stifle
12 competitors as Mr. Falvey implies.

13
14 Q. PLEASE DESCRIBE THE ELECTRONIC DATA INTERFACE -
15 PERSONAL COMPUTER ("EDI-PC") REFERENCED IN MR.
16 FALVEY'S TESTIMONY.

17
18 A. EDI-PC uses a commercially available PC-based customer interface
19 package that provides a Graphical User Interface ("GUI") for the EDI
20 ordering system. EDI-PC is a PC based program that allows CLECs to
21 submit orders via BellSouth's EDI ordering interface without having to
22 incur the expense to build their own interface to EDI.

23

1 EDI-PC has been provided to EDI customers by Harbinger, a Value
2 Added Network provider through its TrustedLink™ Commerce software
3 package. The Harbinger software is Y2K compatible, however, it
4 cannot be expanded to handle the business rules for EDI Version #9 or
5 higher. Harbinger notified BellSouth that it would no longer support
6 further development work for the TrustLink™ Commerce EDI-PC
7 package. The CLEC community was notified of this change via Carrier
8 Notification Letter SN91081477 posted on the BellSouth website at
9 <http://interconnection.bellsouth.com/carrier> on April 5, 1999. The Carrier
10 Notification letter is attached as Exhibit RMP-1.

11
12 BellSouth implemented the combined EDI ordering interface Versions
13 #8 and #9 in January 2000. BellSouth's policy is to support two
14 industry standard versions of the applicable electronic interfaces at all
15 times. The EDI and TAG electronic interfaces are maintained in this
16 manner. BellSouth currently supports EDI Version # 7 and EDI Version
17 # 9.

18
19 Q. ON PAGES 23-24 OF HIS TESTIMONY, MR FALVEY RECOMMENDS
20 THAT THIS COMMISSION "ORDER BELLSOUTH TO KEEP TAG
21 AVAILABLE FOR AT LEAST FIVE YEARS". PLEASE COMMENT.

22
23 A. BellSouth can not commit nor should it be required to commit to
24 keeping any of its electronic interfaces available for a specified period

1 of time. BellSouth develops and implements new and enhanced
2 electronic interfaces in order to meet the needs of the overall CLEC
3 community based on the evolving technology in the telecommunications
4 industry and the national standards established by Electronic
5 Communications Implementation Committee ("ECIC"), the national
6 standards committee of the Telecommunications Industry Forum
7 ("TCIF"). BellSouth and the CLEC community are victims of and must
8 keep pace with the growth and change in the technology related to the
9 telecommunications industry.

10
11 BellSouth gives the CLEC community six (6) months advance notice of
12 the implementation of electronic interfaces based on new industry
13 standards or the retirement of an existing electronic interface.

14 Additionally, the introduction of new electronic interfaces,
15 enhancements to existing interfaces and retirement of existing
16 electronic interfaces are managed through the Change Control Process
17 ("CCP"). This process allows BellSouth and the CLEC community to
18 review, prioritize, and manage any changes and revisions to the
19 electronic interfaces.

20
21 Furthermore, BellSouth has met the requirements of the Act by
22 providing CLECs with non-discriminatory access to the required
23 functions and information through the electronic interfaces in

1 substantially the same time and manner as BellSouth does for itself.
 2 This access provides efficient CLECs with meaningful opportunities to
 3 compete. This Commission should reject e.spire's efforts to require
 4 BellSouth to make TAG available for at least five years.

5
 6
 7 ***Issue 52: Should BellSouth be required to adopt intervals of 4 hours***
 8 ***(electronic orders) and 24 hours (manual orders) for the return of firm***
 9 ***order commitments ("FOCs")?***

10
 11 Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

12
 13 A. First, "FOC" stands for Firm Order *Confirmation*, not commitment. A
 14 FOC is the CLEC's assurance that its Local Service Request ("LSR")
 15 has successfully passed through the various edits and formatting
 16 checks in the Local Exchange Ordering System ("LEO") and the Local
 17 Exchange Service Order Generator ("LESOG") and is pending as an
 18 order in the Service Order Communications System ("SOCS"). The
 19 FOC contains the due date for the order.

20
 21 Secondly, the *BellSouth Products and Services Interval Guide* ("interval
 22 guide") provides reasonable and appropriate time intervals for FOCs.
 23 The interval guide is available on the Interconnection Web site at
 24 http://interconnection.bellosuth.com/guides/guidepdf/intl_is2.pdf

1 BellSouth does not have a corresponding FOC notice for its retail
2 operations. The FOC was developed exclusively to provide such
3 information for CLECs.

4
5 Generally, BellSouth exercises its "best efforts" to provide FOCs within
6 24 hours for complete and correct electronic LSRs received from
7 CLECs. For complete and correct LSRs received manually, BellSouth
8 exercises its "best efforts" to provide FOCs within 48 hours.

9
10 Q. EVEN THOUGH BELL SOUTH'S INTERVAL FOR FOCs FOR
11 ELECTRONICALLY SUBMITTED LSRS IS 24 HOURS, DOES
12 BELL SOUTH ATTEMPT TO RETURN FOCs IN SHORTER
13 INTERVALS?

14
15 A. Yes. Although BellSouth exercises its "best efforts" to return FOCs
16 within 24 hours for complete and correct, electronically submitted LSRs,
17 in South Carolina during December 1999 for resale, BellSouth was able
18 to return 98% of the FOCs within 4 hours for those electronically
19 submitted LSRs for local services that were "totally mechanized".
20 Totally mechanized LSR generation occurs when all aspects of order
21 generation, beginning with the electronic submission of the LSR, and
22 including the electronic transmission of FOCs, are fully mechanized and
23 involve no manual intervention. There are certain totally mechanized
24 services for which this interval is not possible, such as Unbundled

1 Network Elements ("UNEs"). These services are shown on the Interval
2 guide with intervals longer than 24 hours.

3
4 Q. IF BELL SOUTH IS RETURNING 98% OF FOCs FOR TOTALLY
5 MECHANIZED LSRs WITHIN FOUR (4) HOURS, WHY IS E.SPIRE'S
6 PROPOSAL UNREASONABLE?

7
8 A. First, e.spire's proposal is unreasonable because BellSouth is able to
9 return FOCs within 4 hours *only* for complete and correct, electronically-
10 submitted LSRs for services designed to flow through the systems, *i.e.*
11 totally mechanized services, unless otherwise stated in the Interval
12 guide. e.spire wants an FOC returned within 4 hours for *every*
13 electronically submitted LSR. This is unreasonable, because, for
14 complete and correct electronically-submitted LSRs *not* designed to
15 flow through, BellSouth attempts to return FOCs within 24 hours (unless
16 otherwise stated in the Interval guide), not within 4 hours. Also, as
17 stated above, there are certain totally mechanized services, which
18 require a longer interval. Second, e.spire wants a 24-hour interval for
19 FOCs for manual orders. This is unreasonable, because more time is
20 required to handle manual LSRs. Under e.spire's proposal, BellSouth
21 would be required to return FOCs on manually submitted LSRs in the
22 same interval as it takes to return FOCs for certain electronically-
23 submitted LSRs. For complete and correct manually submitted LSRs,
24 BellSouth's 48-hour interval for FOCs reasonably recognizes the work
25 effort involved in manual processing.

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Issue 53: Should BellSouth be required to adopt a prescribed interval for “reject and error” messages?

Q. What is BellSouth position?

A. As part of the Florida OSS Evaluation project, BellSouth has proposed a reasonable reject interval for mechanized orders only of 95% within one hour and for non-mechanized and partially mechanized orders of 85% in less than 48 hours. However, BellSouth believes it should not be obligated to adopt a reject interval because rejects and errors are a measurement of the CLECs performance in producing a complete and correct LSR.

Issue 54: Should BellSouth be required to establish a single point of contact (“SPOC”) for e.spire’s ordering and provisioning, e.g., furnishing the name, address, telephone numbers and e-mail links of knowledgeable employee that can assist e.spire in its ordering and provisioning, along with appropriate fallback contacts?

Q. WHAT IS BELL SOUTH'S POSITION ON THIS ISSUE?

A. BellSouth contends that it already provides e.spire with the assistance it needs to do business with BellSouth. BellSouth should not be required to provide a "SPOC" for inquiries regarding how to order and provision

1 service. Ordering and provisioning information is provided to the
2 CLECs in training classes and is available at BellSouth's
3 Interconnection Web site. Both BellSouth and the CLECs should be
4 responsible for training and maintaining their own competent staff of
5 employees in order to carry out business with one another using the
6 electronic interfaces. e.spire should not be permitted to pass a cost of
7 doing business onto BellSouth.

8
9 Q. DESCRIBE THE ASSISTANCE THAT BELL SOUTH PROVIDES TO
10 E.SPIRE?

11
12 A. Each CLEC's BellSouth Account Team acts as a single point of contact
13 for that CLEC. Contrary to Mr. Falvey's allegations on page 60 of his
14 testimony, the Account Team does provide day-to-day CLEC support
15 and serves as the interface for the pre-ordering and ordering activities
16 associated with Complex Services as required. The Account Team
17 also assists the CLEC with its interaction with the Service Centers, such
18 as the Local Carrier Service Centers ("LCSC"), the UNE Centers, the
19 BellSouth Resale Maintenance ("BRMC") Center, and the Complex
20 Resale Support Group ("CRSG").

21
22 In addition, BellSouth provides numerous employees to assist e.spire
23 and other CLECs in doing business with BellSouth. These include
24 employees who man help desks for technical problems with the
25 electronic interfaces, such as connectivity and password problems, and

1 BellSouth Account Teams, which also assist with the electronic
2 interfaces. BellSouth also provides training classes for CLECs on each
3 of the electronic interfaces, and extensive documentation for those
4 electronic interfaces. In short, BellSouth provides CLECs with ample
5 accessible assistance and thus should not be obligated to provide a
6 "SPOC".

7
8 Q. HAS THE COMMISSION RECENTLY ADDRESSED A SIMILAR
9 ISSUE?

10
11 A. Yes. In the ITC^DeltaCom Arbitration Docket No. 1999-252-C, the
12 Commission held that "BellSouth is not required to specifically
13 designate personnel to serve ITC^DeltaCom or to coordinate orders
14 placed by ITC^DeltaCom". The Commission should find again in this
15 case that BellSouth is not obligated to provide e.spire with the SPOC
16 that it seeks.

17
18
19 ***Issue 58: Should BellSouth be required to provide an electronic feed***
20 ***sufficient to enable e.spire to confirm that directory listings of its***
21 ***customers have actually been included in the databases utilized by***
22 ***BellSouth?***

23
24 Q. WHICH PART OF THIS ISSUE ARE YOU ADDRESSING?

1 A. I am discussing only the portion of this issue that relates to CLECs'
2 access to the directory assistance database. BellSouth Advertising and
3 Publishing Corporation ("BAPCO") issues are not appropriate for
4 arbitration. As such, issues pertaining to BAPCO and e.spire are best
5 dealt with through negotiations and are not subject to arbitration under
6 Section 252 of the Act.

7
8 Q. WHAT IS BELL SOUTH'S POSITION ON THE ISSUE OF PROVIDING
9 AN ELECTRONIC FEED TO ENABLE E.SPIRE TO CONFIRM THAT
10 DIRECTORY LISTINGS OF E.SPIRE END USERS HAVE BEEN
11 INCLUDED IN THE DATABASES UTILIZED BY BELL SOUTH TO
12 GENERATE THE DIRECTORY ASSISTANCE DATABASE?

13
14 A. BellSouth's position is that e.spire can confirm the directory listings
15 used in the directory assistance databases by viewing its end users'
16 customer service records (CSRs) via the electronic TAG or LENS
17 interfaces. The name and address fields contained in the LISTING
18 section of the CSR show the CLEC end user's listing as it appears in
19 the directory. Exhibit RMP-2 contains an example of the fields that
20 appear in the CSR. Thus, e.spire does not need an electronic feed to
21 accomplish its purpose.

22
23 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
24

1 A. Yes. However, I reserve the right to modify and supplement my
2 testimony if necessary.

3

4

Cover Sheet for Pate Exhibit RMP-1

Attached is the
Carrier Notification Letter SN91081477
which consists of 1 page.

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification**SN91081447**

Date: April 5, 1999

To: Competitive Local Exchange Carriers

Subject: CLEC - Harbinger to Discontinue EDI-PC Updates

Electronic Data Interchange – Personal Computer (EDI-PC) uses a commercially available PC-based customer interface package that provides a Graphical User Interface (GUI) for the EDI system. It has been provided to EDI customers by Harbinger, a Value Added Network provider, through its TrustedLink™ Commerce software package.

The Harbinger software is Y2K capable and ANSI Standard 4010 compatible. However, it cannot be expanded to handle the business rules for EDI Version #9 or higher. Harbinger has notified BellSouth that it will no longer support further development work for the TrustedLink™ Commerce EDI-PC package. Harbinger will continue to provide support for the existing package. Other software vendors may develop and provide EDI compatible GUIs that support the more recent EDI versions.

The Telecommunications Access Gateway (TAG) system, combined with a front-end GUI, will provide a CLEC with an integrated customer management solution. This GUI may be developed by a CLEC, obtained from a software provider or purchased from BellSouth. This will allow the CLEC to obtain pre-order information and to do up-front editing, both of which will facilitate sending cleaner, more accurate order transactions to BellSouth. TAG also offers more advanced functional enhancements, Y2K compliance and continuous upgrades.

BellSouth is presently working to develop a standardized CLEC GUI for TAG. Further information on the status of this work will be provided as it becomes available.

Sincerely,

ORIGINAL SIGNED BY JOHN McCAIN FOR JIM BRINKLEY

Jim Brinkley - Senior Director
Interconnection Services

Cover Sheet for Pate Exhibit RMP-2

Attached is the
BellSouth Local Exchange Navigation System ("LENS")
Inquiry Customer Service Record

which consists of 1 page.

Inquiry - Customer Service Record - Netscape
File Edit View Go Communicator Help

© BELL SOUTH
Local Exchange Navigation System
Inquiry Customer Service Record

[Return to Inquiry ►](#)

[View Product and Services](#)

770 435 0734 538 *CSR* SMYR 14RCL E 1

LN BUTLER, ANN W
LA 5060 LAUREL GLEN CT SE, SMYR
SA 5060 LAUREL GLEN CT SE, SMYR
DZIP 30082

---DIR
DDA ANN W BUTLER
5060 LAUREL GLEN CT
SE
SMYR GA 30082
DEL A1, B1, C1, D1

---BILL
BN1 ANN W BUTLER
BA2 5060 LAUREL GLEN CT
BA3 SE
PO SMYR GA 30082

Directory Listing can be confirmed via the fields
contained in the LISTING section of CSR entry:

EXAMPLE:
LN BUTLER, ANN W
LA 506 LAUREL GLEN CT SE

770 435 0734 538 *CSR* SMYR 14RCL E 2

Document Done

STATE OF SOUTH CAROLINA)

CERTIFICATE OF SERVICE

COUNTY OF RICHLAND)



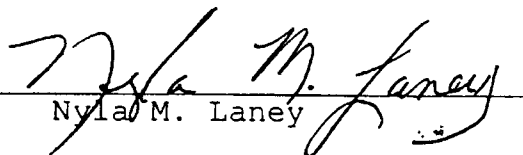
The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department of BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Direct Testimony of Ronald M. Pate filed on behalf of BellSouth Telecommunications, Inc. in Docket No. 2000-040-C to be served this March 24, 2000 by the method indicated below each addressee listed:

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